

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

TYCO FIRE PRODUCTS LP,

Plaintiff,

v.

AIU INSURANCE COMPANY, ET AL.,

Defendants.

Civil Action No. 2:23-cv-02384-RMG

**DEFENDANTS TRAVELERS CASUALTY AND SURETY COMPANY F/K/A THE AETNA
CASUALTY AND SURETY COMPANY AND THE TRAVELERS INDEMNITY COMPANY'S
MOTION FOR PARTIAL SUMMARY JUDGMENT ON THE APPLICATION OF CERTAIN
POLLUTION EXCLUSIONS**

Defendants, Travelers Casualty and Surety Company f/k/a The Aetna Casualty and Surety Company and The Travelers Indemnity Company ("Travelers"), hereby file this Motion for Partial Summary Judgment on the Application of Certain Pollution Exclusions, and for the reasons stated in the attached brief, requests summary judgment as follows:

1. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Respectfully submitted,

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Company f/k/a The Aetna Casualty and Surety
Company and The Travelers Indemnity
Company (collectively, "Travelers")*

CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2024, I electronically filed the foregoing document with the United States District Court, District of South Carolina, Charleston Division's Clerk of the Court using the ECF system, which sent notification of such filing to all counsel of record.

s/ Steven J. Pugh _____

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